

# Exhibit B

**IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF PENNSYLVANIA**

FEDERAL TRADE COMMISSION,

Plaintiff,

V.

Case No. 2:24-CV-4949

EMPIRE HOLDINGS GROUP LLC,  
d/b/a ECOMMERCE EMPIRE BUILDERS  
and STOREFUNNELS.NET, a limited liability  
company, and PETER PRUSINOWSKI  
Individually and as officer of  
Empire Holdings Group LLC,

Defendants.

**DEFENDANTS' FED. R. CIV. P. 30(b)(6) NOTICE OF DEPOSITION  
TO PLAINTIFF FEDERAL TRADE COMMISSION**

**PLEASE TAKE NOTICE** that Defendants Empire Holdings Group LLC d/b/a E-Commerce Empire Builders and Storefunnels.net (“EEB”), and Peter Prusinowski, pursuant to Fed. R. Civ. P. 30(b)(6), will take the deposition upon oral examination of Plaintiff Federal Trade Commission (“FTC”) on October \_\_, 2024, at 10:00 a.m. EDT.

The deposition will be taken before a qualified, certified court reporter or other officer authorized by law to administer oaths and will continue on the day noticed and for additional days, if necessary, from day to day, excluding Saturdays, Sundays, and legal holidays, until completed. The deposition, upon oral examination, shall be recorded by stenographic means and may be videotaped, and will concern the topics identified in the attached Exhibit A.

As required by Federal Rule of Civil Procedure 30(b)(6), the FTC shall designate one or more persons to testify concerning the deposition topics identified in Exhibit A. The persons designated to testify as to each topic should have knowledge of the documents referring or relating

to the topic and the identity of the persons with knowledge of that topic, at a minimum.

Each deposition designee produced to testify has an affirmative duty to have reviewed all documents, reports, and other matters reasonably known to the FTC, along with familiarizing themselves with all potential witnesses known or reasonably available to provide informed, binding answers and the deposition.

Date: September 24, 2024

Respectfully submitted,

/s/ Clair E. Wischusen

Clair E. Wischusen (Bar No. 306752)

Ryan Poteet (*pro hac vice*)

Stephan Freeland (*pro hac vice*)

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*Counsel for Defendants*

*Empire Holdings Group LLC and*

*Peter Prusinowski*

**Exhibit A**

**Fed. R. Civ. P. 30(b)(6) Topics**

1. Communications with current and former customers of E-Commerce Empire Builders.
2. Communications with current and former customers of Storefunnels.net.
3. Consumer complaints regarding E-Commerce Empire Builders and/or Storefunnels.net.
4. Advertising and marketing of E-Commerce Empire Builders' services.
5. Advertising and marketing of Storefunnels.net's services.
6. Communications with Randy Hlavac concerning any facts.
7. Communications with James Salvage, Rufus Jenkins, and Osasu Joseph.
8. Revenue earned by E-Commerce Empire Builders and/or Storefunnels.net.
9. The FTC's investigation of Defendants.
10. The business model of E-Commerce Empire Builders.
11. The business model of Storefunnels.net.

**CERTIFICATE OF SERVICE**

I, the undersigned, hereby certify that on this 24<sup>th</sup> day of September 2024, a true and correct copy of the foregoing Defendants' Fed. R. Civ. P. 30(b)(6) Notice of Deposition to Plaintiff Federal Trade Commission was served via email.

By: /s/ Clair E. Wischusen  
Clair E. Wischusen